

Exhibit C

Affidavit of Brenda Tracy

**STATE OF MICHIGAN
IN THE 30th JUDICIAL CIRCUIT**

BRENDA TRACY, LLC, SET THE EXPECTATION, A NON-PROFIT ORGANIZATION,
JANE DOE 1; and JANE DOE 2,

Plaintiffs,

Case No.

The Honorable Judge

v.

AGUSTIN ALVARADO; MEL TUCKER; JENNIFER Z. BELVEAL;
JOHN DOE(S) AND JANE DOE(S) IN POSSESSION OF RECORDS
WHOSE NAMES ARE KNOWN ONLY TO DEFENDANTS,

Defendants.

Eric D. Delaporte (P69673)
Gina Goldfaden (P86863)
DELAPORTE LYNCH, PLLC
Attorneys for Plaintiff
210 State St., Suite B
Mason, MI 48854

AFFIDAVIT OF BRENDA TRACY

I, Brenda Tracy, swear and affirm the following:

1. I am the founder and president of the organization *Set the Expectation*, (STE), a 501 (c) (3) corporation.
2. As the founder and president of STE, I educate colleges and universities across the country regarding sexual assault prevention and trauma-informed response to assault victims.
3. Ahlan Alvarado (now deceased) was my closest friend of more than 20 years. Ahlan was also my right-hand person in administering STE. In our respective roles in STE, we often discussed confidential matters involving outside parties. Those parties are completely independent of anything to do with the matter involving Michigan State University and the termination of the football coach.

4. Our confidential discussions involve highly sensitive information regarding other survivors and their families. These discussions were never intended to be shared with anyone outside of STE.
5. As the founder of STE, survivors look to me as a support and confidant. Survivors depend on me to provide them with safe support and guidance in their recovery. I am oftentimes the sole person that the survivor confides in. These survivors have not disclosed what has happened to their families and friends.
6. Without my knowledge or consent, text messages between Ahlan and me were obtained from an outside party, and subsequently disclosed to the university and the media. These messages were obtained from Ahlan's personal cell phone after her untimely death in a motor-vehicle accident.
7. That outside party has implied that there are additional text messages that they are prepared to release.
8. Releasing personal text messages involving private sensitive matters puts outside parties at risk.
9. In addition to sensitive survivor information, Ahlan's phone contained my business records, calendar, college and university information, and other business-related information.
10. I am gravely concerned about the mental health and personal safety of the individuals that have confided in me with the expectation of privacy and confidentiality.
11. Ahlan's phone contains sensitive information, including but not limited to text messages, email, photographs, and other identifying information.

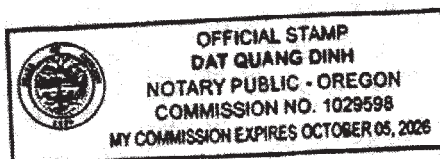
Brenda Tracy

Brenda Tracy

STATE OF OREGON)

COUNTY OF Multnomah)

Acknowledged before me in Multnomah County, Oregon, on 10/5 2023 by
Brenda Tracy.



[Signature]

Multnomah County, Oregon

My Comm. Expires: 10/05/2026